



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 13, 2020

BY ECF

The Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: *United States v. Michael Avenatti*,
19 Cr. 373 (PGG)**

The Government respectfully requests that Your Honor allow the Government to arrange for the provision of secure high-speed wired Internet access in the courtroom for trial in the above-captioned matter. The secure Internet connection will enable the trial team in the courtroom to stay connected to our online case repository and resources in the office during critical moments of the proceedings. This will greatly facilitate the effective and efficient presentation of evidence. In addition, we will be able to reduce the files and personnel we bring into the courtroom, as well as the traffic to and from the courtroom during proceedings.

Subject to your approval, we will retain Courtroom Connect to provide these services. Courtroom Connect does not require any court resources to provide service and currently maintains a network in the courthouse that is 100% independent of the Court's internal network. Set up, installation and service fees will be paid for by the Government at no cost to the Court.

The following describes, in sum, how Courtroom Connect restricts access to the network and ensures compliance with court security and directives:

- The network will be a hard-wired, secure physical network connection utilizing a firewall and other security provisions.
- Onsite support, maintenance and other measures are provided to ensure the highest levels of security and reliability.
- The network is totally separate from the court's internal network; it is therefore physically impossible for information on the court's existing systems to be accessed or compromised.

Courtroom Connect will make all necessary arrangements with the Court's District Executive office and computer networking personnel.

Honorable Paul G. Gardephe
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If Your Honor is agreeable to these arrangements, the Government respectfully requests that you sign the enclosed proposed order permitting us to proceed.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

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Enclosure

cc: (by ECF)

Counsel of Record

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

- v.- : S1 19 Cr. 373 (PGG)

MICHAEL AVENATTI, :

Defendant. :

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IT IS HEREBY ORDERED THAT Courtroom Connect, a Southern District of New York contracted vendor, may provide the Government in *United States v. Michael Avenatti*, S1 19 Cr. 373 (PGG), with an Internet connectivity feed for the duration of the trial proceedings, set to begin on Tuesday, January 21, 2020. Courtroom Connect should make proper arrangements with the District Executive Office of the Court and the official court reporter.

Dated: January __, 2020

New York, New York

HONORABLE PAUL G. GARDEPHE
UNITED STATES DISTRICT JUDGE